

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

LEURY MENDEZ-MATOS
Defendant.

CASE NO. 13-869 (GAG)

INFORMATIVE MOTION

TO THE HONORABLE COURT:

COMES NOW, Laura I. Soto-Santiago, attorney for the defendant and very respectfully states as follows:

On April 28, 2020, Mr. Mendez-Matos filed a motion seeking compassionate release based on his many medical conditions. On that same date, the Court appointed attorney from the FPD and ordered the government to respond by **May 15, 2020**. As of today, no motion has been filed. On June 3, 2020, undersigned sent a letter to Mr. Mendez requesting him to return the required waivers with his signature for me to request the necessary records from the Bureau of Prisons. Additionally, undersigned requested Mr. Matos to initiate or provide evidence of exhaustion of administrative remedies within the BOP with the filing of a BP-9, to comply with the statutory obligation.

In response, Mr. Mendez send the undersigned a box with over 500 pages of medical records. Undersigned has carefully reviewed all records and belief Mr. Mendez petition to have merits. Undersigned and her assistant has spoken with several of Mr. Mendez's family members and explained that Mr. Mendez needs to

send (or re-send) the waivers, PATTERN Score and evidence of exhaustion, in order for us to file the petition. Nevertheless, it seems like there has been a miscommunication between Mr. Mendez' family, himself and the undersigned.

On the other hand, in hopes to reach a stipulation, undersigned contacted the U.S. Attorney's office. As of the information available in the docket, the prosecutor in this case appears to be AUSA Tiffany, whom is no longer in the District of San Juan. However, after speaking with the receptionist, it was explained that the case is yet to be assigned and that my information will be forwarded to the duty attorney.

Earlier today, a letter was sent to Mr. Mendez with a copy of the waivers and urging him to add me to his *corrlinks* authorized e-mail addresses, for us to have a more direct line of communication. A request for a legal call was also sent to personnel in FCI Gilmer.

Undersigned takes very seriously her obligations with her clients and to the Court and does not take this matter lightly. Undersigned intends to file Mr. Mendez's petition as expeditiously as possible.

WHEREFORE, the parties respectfully request that this Honorable Court takes notice of the above-mentioned information.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 19th day of January 2021.

s/Laura I. Soto-Santiago

Laura I. Soto-Santiago

Research and Writing Specialist

USDC-PR 302905

241 F.D. Roosevelt Ave.

Hato Rey, P.R. 00918-2441

(787) 281-4922/ Fax (787) 281-4899

E-mail: Laura_Soto@fd.org